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BEXLEY PUBLIC RADIO FOUNDATION
2700 EAST MAIN STREET, SUITE 208
COLUMBUS, OHIO 43209
VOICE 614 235 2929
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July 1, 2004

Federal Communication Commission,
Office of Secretary
9300 East Hampton Drive
Capital Heights, MD 20743


Re: In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM
Broadcast Stations, (Wilmington and Mount Sterling, Ohio)
MB Docket No. 04-161
RM-10961

To the Secretary

Enclosed are one original, four copies and one acknowledgement copy of Reply
Comments of Bexley Public Radio Foundation in the above reference matter.

Please date stamp the acknowledgement copy and return it to me in the enclosed postage
prepaid envelope.

Thank you.


Kurt Weiland
Treasurer

Enclosures

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Before the
Federal Communications Commission
Washington, D.C. 20554

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)
Amendment of Section 73.202(b)) MB Docket No. 04-161
Table of Allotments) RM-10961
FM Broadcast Stations)
(Wilmington and Mount Sterling, Ohio))
)

REPLY COMMENTS

To: Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, TW-A325
Washington, D.C. 20554

Copy to: Dennis F. Begley, Esq.
Reddy Begley & McCormick
1156 15th Street, NW Suite 610
Washington, D.C. 20005-1770

Bexley Public Radio Foundation (BPRF) is an applicant for a for a construction permit for a low power FM broadcast station, FCC File No. BNPL 2001 01 22 AAW. The application was for operations on Channel 271 (102.1 FM)

On October 29, 2003, BPRF and four other applicants for LPFM licenses on channel 271 entered into a timeshare agreement and thereafter submitted a joint request for the FCC to approve their universal timeshare agreement.

This joint request is pending before the FCC.

In addition to BPRF, the other applicants are Groveport Madison Schools, Community Refugee and Immigration Services, Inc., Simply Living and Capital University. All of these applicants are either public organizations or 501 (c) (3) nonprofit organizations.

All of these organizations serve populations located in the Columbus SMSA.

Petitioner's Net Gain Computation is wrong

The anticipated practical effect of the proposed rule amending the FM Table of Allotments will be to limit BPRF (and Capital University and Groveport Madison Local

School s) ability to obtain construction permits for their antennas because of interference from the proposed WKLN(FM) antenna location in Mount Sterling, Ohio

BPRF and Capital University propose to serve listening audiences in the Bexley, Ohio and Whitehall, Ohio communities together with students at educational institutions that are located in these areas.

WKLN(FM) proposes to be the first local aural transmission service in the Mount Sterling area. The local population was measured at 1,865 in the 2000 census.

Petitioner's computes a net gain of 27,935 people served if its application is granted. Petitioner ignores the effect of its proposal will have by impairing BPRF's (and Capital University and Groveport Madison Local Schools) ability to obtain LPFM licenses.

Capital University and BPRF together will serve the university population of about 4,000 students, Bexley residents numbering 12,000 persons and Whitehall residents totaling 19,000 persons.

If the petition is granted, there will be a net loss of populations served by FM radio broadcast.

Public Interest Will Be Harmed if Petition is Granted

BPRF, Capital University and Groveport Madison Local Schools as LPFM licensees will serve unique audiences that are currently underserved by providing listening opportunities and more importantly broadcast and production opportunities to students and by serving listeners in their local communities.

These students, together with the Bexley and Whitehall residents will be deprived of the special advantages local LPFM broadcast creates. These advantages are legitimate public interest matters as used in 90 FCC 2d 88 (1982)

Both Whitehall and Bexley have respectively significant minority and immigrant populations. Capital University serves significant umbers of minority and foreign students. In contrast, Mount Sterling has not significant minority or immigrant populations.

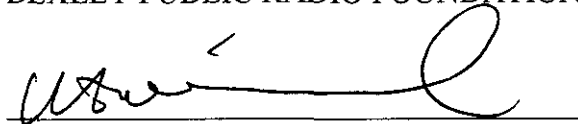
Finally, BPRF will also make production opportunities available to Mount Sterling students and other residents who are interested in learning radio broadcast and production.

A Request has been addressed to Vernon R. Baldwin, Inc. for it to Withdraw its Petition

BPRF has requested that Petitioner Vernon R. Baldwin, Inc. withdraw its petition and consider other antenna locations that will not interfere with the application of BPRF.

Respectfully submitted,

BEXLEY PUBLIC RADIO FOUNDATION

A handwritten signature in black ink, appearing to read 'Kurt Weiland', is written over a horizontal line.

Kurt Weiland, Treasurer

Commercial overnight mail of one original and four copies was addressed to Federal Communication Commission, Office of Secretary, 9300 East Hampton Drive, Capital Heights, MD 20743.